

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

- v. -

KEITH RANIERE, CLARE BRONFMAN,
ALLISON MACK, KATHY RUSSELL,
LAUREN SALZMAN, and NANCY SALZMAN,

Defendants.

No. 18-cr-204 (NGG) (VMS)

NOTICE OF MOTION TO SUPPRESS

PLEASE TAKE NOTICE that, upon the annexed Memorandum of Law, dated February 18, 2019, the Declaration of Clare Bronfman, dated February 18, 2019, the Declaration of Dennis K. Burke, dated February 18, 2019, and the exhibits appended to these Declarations, Defendant Clare Bronfman moves this Court, before the Honorable Nicholas G. Garaufis, at the United States District Court for the Eastern District of New York, 225 Cadman Plaza East, Brooklyn, New York, for an Order suppressing the documents taken from her storage unit, or, at a minimum, directing that an evidentiary hearing be held to examine the circumstances of the government's acquisition and review of these documents, and for such further relief as the Court may deem proper.

Dated: February 19, 2019
New York, New York

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